IN THE UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF TENNESSEE

| SNMP RESEARCH, INC. and SNMP | § | |
|-------------------------------|---|--------------------------------|
| RESEARCH INTERNATIONAL, INC., | § | |
| | § | Case No. 3:20-cv-00451-CEA-DCP |
| Plaintiffs, | § | |
| | § | |
| V. | § | Jury Demand |
| | § | |
| BROADCOM INC.; BROCADE | § | |
| COMMUNICATIONS SYSTEMS LLC; | § | |
| AND EXTREME NETWORKS, INC., | § | |
| | § | |
| Defendants. | § | |
| | § | |

PLAINTIFFS' RESPONSE IN SUPPORT OF EXTREME NETWORK, INC.S' MOTION FOR LEAVE TO FILE DOCUMENTS UNDER SEAL

Come now Plaintiffs SNMP Research, Inc. and SNMP Research International, Inc. (collectively "Plaintiffs"), by and through counsel, pursuant to Fed. R. Civ. P. 5.2 and Local Rule 26.2(b) of this Court, and this Court's Memorandum and Order Regarding Sealing Confidential Information [Doc. 11], and respectfully submit this response in support of Extreme Networks, Inc.'s Motion for Leave to File Documents Under Seal ("Extreme's Motion to Seal") [Doc. 165].

In Extreme's Motion to Seal, Defendant seeks leave of the Court to file (1) a redacted version of its Memorandum of Law in Support of Its Motion to Compel Mediation ("Memorandum") [Doc. 165-1] and (2) a redacted version of the Declaration of Leslie A. Demers in Support of Extreme's Motion to Compel Mediation ("Declaration") [Doc. 165-2] because the documents contain Plaintiffs' pricing information on pages 3 and 5-6 of the Memorandum and page 2 of the Declaration.

Plaintiffs are in agreement with and support Extreme's Motion to Seal and the granting of leave to Extreme to file the redacted versions of the Memorandum and Declaration because the information

redacted therein is pricing information that is commercially sensitive. As this Court has previously held in this case, good cause exists for sealing such commercially sensitive pricing information because Plaintiffs' privacy interests with respect to such pricing information outweigh the public's interest in accessing such information since the public disclosure of such information could be used by Plaintiffs' competitors to gain leverage over Plaintiffs. [Docs. 89; 132].

WHEREFORE, Plaintiffs support Extreme's Motion to Seal and respectfully request that this Court grant Extreme leave to file the redacted versions of the Memorandum and Declaration.

Respectfully submitted,

Dated: August 10, 2022

By: /s/ John L. Wood

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Dated: August 10, 2022

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¹ Extreme also makes misleading arguments with respect to the information, as noted in Plaintiffs' opposition to Extreme's motion to compel mediation.

SNMP Research International, Inc. SNMP Research, Inc.